

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
VINCENT VALENTINE, a/k/a "V"	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (conspiracy to
	:	interfere with interstate commerce by
	:	robbery - 1 count)
	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery - 1 count)
	:	18 U.S.C. § 924(c)(1) (carrying a firearm
	:	during and in relation to a crime
	:	of violence - 1 count)
		18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the Henneberry Pharmacy, located at 838 N. 24th Street in Philadelphia, Pennsylvania ("Henneberry Pharmacy"), was engaged in the retail sale of pharmaceuticals, cigarettes, and packaged goods in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about June 28, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**VINCENT VALENTINE,
a/k/a "V,"**

conspired and agreed, together with Khalil Carter, charged elsewhere, and one other person

unknown to the grand jury (“Person #1”), to unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, that is, to unlawfully take property, specifically, cash and prescription drugs, from the person and presence of employees of the Henneberry Pharmacy, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of this conspiracy that:

3. Defendant VINCENT VALENTINE, together with Khalil Carter and Person #1, planned and executed the robbery of Henneberry Pharmacy to obtain cash and prescription drugs.

4. In the commission of the robbery of Henneberry Pharmacy, defendant VINCENT VALENTINE, together with Khalil Carter and Person #1:

- a. armed themselves with firearms;
- b. drove together to an area near the Henneberry Pharmacy;
- c. attempted to conceal their identities by covering their faces;
- d. entered the Henneberry Pharmacy brandishing firearms, and then threatened to injure and kill employees to obtain money and prescription drugs; and
- e. after obtaining the cash proceeds from the victim business, fled, split the cash proceeds, and distributed the drugs.

OVERT ACTS

_____ In furtherance of the conspiracy and to effect the objects of the conspiracy, defendant VINCENT VALENTINE, together with Khalil Carter and Person #1 unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania on or about June 28, 2006:

1. Khalil Carter borrowed a 1999 Dodge Durango, Pennsylvania tag number GJB5577 (the “Durango”), from Person #2 who is known to the grand jury (Person #2).

2. Defendant VINCENT VALENTINE, together with Khalil Carter and Person #1, drove the Durango and parked it near the intersection of Ringgold Street and Parrish Street in Philadelphia, Pennsylvania, which was approximately one block away from the Henneberry Pharmacy.

3. At gunpoint, defendant VINCENT VALENTINE, together with Khalil Carter and Person #1, entered the Henneberry Pharmacy, brandished firearms and threatened the pharmacy employees, demanded money and prescription drugs from employees, and stole approximately \$3,100 in cash and prescription drugs.

4. Upon returning to the Durango to flee, defendant VINCENT VALENTINE removed a bag that was covering the license tag of the Durango.

5. Defendant VINCENT VALENTINE, together with Khalil Carter and Person #1, then fled in the Durango.

6. To evade detection by law enforcement, Khalil Carter instructed Person #2 to report falsely to police that the Durango had been stolen.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 and 4 and Overt Acts 1 through 6 of Count One of this indictment are incorporated here.

2. On or about June 28, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**VINCENT VALENTINE,
a/k/a "V,"**

together with Khalil Carter, charged elsewhere, and Person #1 unknown to the grand jury ("Person #1"), obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant VALENTINE, together with Khalil Carter and Person #1, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash and prescription drugs from the Henneberry Pharmacy located at 838 N. 24th Street in Philadelphia, Pennsylvania, in the presence of employees of the Henneberry Pharmacy and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees of the Henneberry Pharmacy, that is, by brandishing a gun, demanding money and prescription drugs, and threatening employees of the Henneberry Pharmacy.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 28, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**VINCENT VALENTINE,
a/k/a "V,"**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney